



Royell Communications, Inc.
126 N Hobson Street
Virden, IL 62690
217-965-3699

August 9, 2014

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

*Re: Revision of Part 15 of the Commission's Rules to Permit Unlicensed
National Information Infrastructure (U-NII) Devices in the 5 GHz Band,
ET Docket No. 13-49*

Comments in Support of Petition for Reconsideration of WISPA, Cambium, Mimosa Networks and JAB

Dear Ms. Dortch,

Royell Communications, Inc. (Royell) strongly supports the Petitions for Reconsideration submitted by WISPA, Cambium, Mimosa Networks, Ubiquiti, and JAB. Royell respectfully requests reconsideration of the Commission's decision to adopt more stringent Section 15.407 "unwanted emission" limits for unlicensed point-to-point and point-to-multipoint devices operating in the 5725-5850 MHz band. If this rule change is permitted to stand, it will prevent Royell from continuing to serve many of its residential and business subscribers that currently rely on this band to obtain fixed broadband internet services. Royell urges the Commission to retain the existing "unwanted emission" limits for the 5725-5850 MHz band described in Section 15.247.

Royell is a fixed wireless Internet service provider utilizing the unlicensed and lightly licensed frequencies in the 900 MHz, 2.4 GHz, 3650 MHz, and 5 GHz bands for last-mile services, and utilizes unlicensed frequencies in the 5725-5850 MHz band and other licensed microwave bands for point-to-point and backhaul connectivity. Royell's customer base and coverage area comprises 4,500 customers in 6 counties just south of Springfield, IL. Many Royell customers live in un-served and underserved rural areas and have no other viable option for their broadband internet service.

70% of the point-to-point connections between Royell tower sites utilize radio equipment operating in the 5725-5850 MHz band. This band is the only unlicensed band capable of providing long distance connectivity with excellent bandwidth. Replacing these point-to-point connections with licensed microwave equipment would be the only viable alternative if the current rules stand and this would cause incalculable economic hardship to be imposed on Royell. Our company estimates hundreds of thousands of dollars of new debt would be added.

In addition, Royell serves many customers with point-to-multipoint tower sites utilizing the 5725-5850 MHz band and there would be no alternative unlicensed frequency band available for these sites. This 5725-5850 MHz band is also utilized for many point-to-point connections from Royell tower sites directly to schools and businesses who need higher bandwidth packages than are available from current point-to-multipoint radio equipment. At this point our company has no viable alternative to replace this equipment.



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Royell just celebrated our 15th anniversary and throughout these years of success and growth we have utilized the unlicensed 5725-5850 MHz band. This band has been the workhorse creating the backbone for our network. It is imperative for the success of our business, our customers, and our employees to continue to utilize this band under the Section 15.247 rules. We respectfully petition the Commission to retain the Section 15.247 rules for the 5725-5850 MHz band.

Sincerely,

Royell Communications, Inc.

A handwritten signature in black ink, reading "Joseph H. Royer", is written over a horizontal line.

Joseph H. Royer

President & GM